



LAWRENCE S. LUSTBERG
Director

Gibbons P.C.
One Gateway Center
Newark, New Jersey 07102-5310
Direct: (973) 596-4731 Fax: (973) 639-6285
llustberg@gibbonslaw.com

November 9, 2015

VIA ECF

Honorable Mark Falk
United States Magistrate Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

**Re: *In re Urethane Antitrust Litigation*,
Docket No. 08-5169 (WJM) (MF)**

Dear Judge Falk:

This firm, along with Dechert LLP, represents defendant The Dow Chemical Company ("defendant" or "Dow") in the above-referenced action. In accordance with my colleague Daniel McGrady's conversation of this morning with Your Honor's chambers, enclosed please find a proposed Order to seal certain Briefs and Exhibits submitted by the parties in connection with Dow's Motion to Exclude the Expert Testimony of Plaintiffs' Damages Expert Dr. Leslie Marx. As noted in the proposed Order, the United States District Court for the District of Kansas, which handled the prior multidistrict litigation in this matter, previously required that these documents be sealed.

Of course, if you have any questions or concerns with regard to this matter, please do not hesitate to contact us. Thank you for your kind consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink that reads "Lawrence S. Lustberg" followed by a stylized monogram "LSL".

Lawrence S. Lustberg

Enclosure

cc: All counsel of record (via ECF)